



VFS Group's Privacy Policy outlines how we manage personal information we hold about our clients, and individuals whom we deal with.

We are required to understand our clients' needs in the provision of financial services. In order to do this in an effective manner, we need to collect certain personal information from our clients. Our Privacy Policy is based on openness. We are dedicated and committed to being open about how we use your personal information. In situations where we ask for your personal information, we will generally state for what purposes it will be used and to whom it may be disclosed.

VFS Group's Privacy Policy is reviewed from time to time to take into account new laws, changes to our operations and practices and to make sure it continues to remain appropriate to the changing environment. Any personal information we hold will be governed by the most recent Privacy Policy.

### **How we treat the information we collect**

It is VFS Group's policy to respect the confidentiality of information and the privacy of our clients and individuals we deal with. VFS Group treats all personal information in accordance with the *Privacy Act 1988* (Privacy Act) and the Australian Privacy Principles which this policy is based on.

### **Personal information we collect**

Due to the nature of the financial products and services provided, government regulations and taxation laws, we ask for personal information from our clients. The personal information we may collect can include (but may not be limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, trading statements, tax and financial statements and employment details.

Most of the personal information that we collect is obtained directly from our clients through application or other forms, and from maintaining records of information obtained in the course of providing our products and services. We may also obtain information from third parties.

We may from time to time collect information voluntarily through market research, surveys or special offers. We may use this information to improve our product and service offerings and to consider the wider needs of our clients or potential clients.

In the event of you not providing sufficient information required to fulfil your request for the provision of a product or service, we may be unable to provide you with the product or service that you requested.

### **Using the personal information we collect**

VFS Group may send you marketing material from time to time that we believe will be useful to you however we remain conscious of the need to respect your privacy.

Unless we inform you otherwise, the personal information we collect and maintain from you is used for the purpose of establishing and managing your account with us, reviewing your ongoing needs, improving our customer service and products and providing you with ongoing information or opportunities that we believe may be useful to you.

Depending on restrictions concerning sensitive information we may disclose your personal information to the following parties:

- Other companies or subsidiaries associated with VFS Group who provide financial and other services;
- financial institutions and other similar organisations that VFS Group deals with in the course of providing its products and services, or those that are nominated by you;

We generally require that organisations not associated with VFS Group but may be contracted to provide a service to VFS Group and handle or obtain personal information acknowledge the confidential nature of this personal information and undertake to respect client privacy and comply with the Australian Privacy Principles, the Privacy Act and VFS Group's Privacy Policy.

**Restrictions on sensitive information**

Certain information we hold is sensitive, this includes tax statements and information received from credit reporting agencies about an individual. The use of such information may also be restricted by law.

Sensitive information may be used by VFS Group in the process of assessing credit worthiness and applicant suitability. It is VFS Group's policy that sensitive information collected will be used and disclosed only for the purposes for which it was obtained, unless the client agrees otherwise or the use or disclosure of this information is allowed by law.

**Managing the personal information we collect**

All of our employees who handle personal information are trained to respect the confidential nature of client information and the privacy of individuals. Breaches of your privacy are taken very seriously and may result in disciplinary action, including dismissal.

VFS Group has a Privacy Officer who ensures that all personal information collected is managed in accordance with this statement the Australian Privacy Principles and the Privacy Act.

**Storing the personal information we collect**

Ensuring that the personal information you provide us is appropriately safeguarded is extremely important to us, whether you communicate with us personally, by phone, mail, email, over the internet or in any other electronic form. We hold all of your personal information in secure computer storage facilities and in paper-based files, and take steps to protect your personal information that we hold from misuse, loss, unauthorised access, modification or disclosure.

We may be required by law to maintain records for a significant period of time. However, when we consider information is no longer required or relevant and any legal obligations that may apply to the information held have been met, we will remove details that identify you or we will securely destroy the records.

**Keeping your personal information accurate and up-to-date**

We aim to ensure that all personal information we hold is accurate and up-to-date. We understand that information changes frequently with changes in address and other personal circumstances. In some circumstances we will be able to update your personal information over the telephone.

**Checking what personal information we hold about you**

The Privacy Act, gives you the right to obtain a copy of any personal information we hold about you and to advise us of any perceived inaccuracies. There are however some exceptions to the Act.

To request a copy of the information we hold about you, we require that you complete a request form verifying your identity and specifying what information you require

Your request will be acknowledged within 14 days and responded to promptly. We may charge you a fee to cover the cost of verifying your application, locating, retrieving, reviewing and copying any of the information that you request. Should you require extensive information, we will provide you with an outline of the likely cost prior to processing to aid you in refining your request if required.

**Website privacy**

VFS Group may collect personal information from you when you enter our website [www.vfsgroup.com.au](http://www.vfsgroup.com.au)

**How we use cookies on our Website**

Cookies are used on our website to give you access to certain pages without having to log in each time you view the page. We may also use independent external service providers to track our website traffic and usage

**What is a cookie?**

Cookies are small strings of text stored on your computer that help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure that the information you provide us is secure. We use the information we collect to provide you with a more relevant and effective experience when you use our web site, including presenting web pages according to your needs or preferences.

Cookies are commonly used on many websites, you are able to choose if and how a cookie will be accepted by changing the preferences and options on your web browser. Parts of our website may not be accessible if you disable cookie acceptance in your browser, typically this applies to more secure parts of our website. To gain full benefit from all the services provided on our website we recommend you change the preferences in your web browser to enable cookie acceptance.

**Changes in technology**

Technology changes may affect the way in which we use and collect personal information from you. Such changes may affect your privacy, you will be notified in this section should we make any such changes to our website.

**Links to third party websites**

From time to time we may place links on our website to external third party websites that we consider may be of benefit to you. You should note that third party websites are not covered by our Privacy Policy. If you elect to link to the website of a third party, you may be asked to provide registration or other information. Please note that the information you are providing may be collected. You should familiarise yourself with our Privacy Policy adopted by that third party.

**Complaining**

If you feel that VFS Group, its employees or service providers have breached this Privacy Policy or the Australian Privacy Principles or has not respected your privacy, we encourage you to lodge a complaint.

You may refer your complaint to our Privacy Officer. They will review your complaint and promptly act upon it. Our Privacy Officer may be contacted on 1300 220 360, by email to [info@vfsgroup.com.au](mailto:info@vfsgroup.com.au) or alternatively by writing to:

**The Privacy Officer**

Vertical Capital Markets Pty Ltd  
GPO Box 4929  
Sydney NSW 2001

If you are not satisfied with our response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC). For more information about how you may lodge a complaint with the OAIC, please contact the Commissioner's hotline service on 1300 363 992 or +61 2 9284 9749 (if outside of Australia), website [www.oaic.gov.au](http://www.oaic.gov.au).

**Contacting us**

Should you wish to make a general enquiry about our Privacy Policy, update the personal information we hold about you or obtain an application form for access to your personal information you can contact us by either:

Writing to us at:

Vertical Capital Markets Pty Ltd  
GPO Box 4929  
Sydney NSW 2001

Telephone: 1300 220 360  
Email: [info@vfsgroup.com.au](mailto:info@vfsgroup.com.au)